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April 27, 2020

Hon. Andrew L. Carter, Jr.
United States District Court for the
Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, New York 10007-1312

Re: *Lovati et al. v. Bolivarian Republic of Venezuela*,
Nos. 19-cv-4793 and 19-cv-4796

Dear Judge Carter:

The Bolivarian Republic of Venezuela respectfully requests that the Court schedule oral argument on the Republic's pending Motion to Vacate Certificate of Default and Dismiss for Lack of Personal Jurisdiction. *See* No. 19-cv-4793, ECF No. 37; No. 19-cv-4796, ECF No. 43.

The Republic's motion raises an important question of statutory interpretation that could affect the foreign relations of the United States—namely, whether foreign sovereign states can be served by methods other than those in strict accordance with the Foreign Sovereign Immunities Act (FSIA), 28 U.S.C. § 1608(a). The Republic believes that oral argument would facilitate the Court's resolution of that question.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read 'Kent A. Yalowitz', with a large, stylized flourish at the end.

Kent A. Yalowitz

Counsel for Defendant the Bolivarian
Republic of Venezuela

cc: All ECF Counsel